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October 1, 1991

Mr. William K. Reilly, Administrator
U. S. Environmental Protection Agency
401 M Street S.W.
Washington, DC 20460

OCT 17 1991

Dear Mr. Reilly:

Re: Docket A-91-46

Sinclair Oil Corporation reiterates its support for Ethyl Corporation's applied waiver to E.P.A. for allowing the gasoline additive methylcyclopentadienyl manganese tricarbonyl (MMT).

As set forth in our letter of July 11, 1990 to Mary T. Smith:

Sinclair is a small refiner as defined by the Clean Air Act and as such is limited by personnel and financial constraints. Unlike major oil companies with substantial research capabilities, Sinclair relies on commercially available and cost-effective additives in the formulation of our gasolines. The need to change fuel compositions in the 1990's will correspondingly require the availability of cost-effective additives such as MMT, especially for smaller facilities. Given the extraordinary costs refiners will incur under the Clean Air Act, Sinclair strongly believes requests such as the MMT waiver should be approved, absent conclusive evidence the additive raises serious health and safety concerns.

Sincerely,

M. D. Ensign
Executive Vice President

MDE/Ita

cc: Mary T. Smith, U.S. E.P.A.
Clinton W. Ensign, Sinclair Oil Corporation
David C. Wilson, Ethyl Canada, Inc.